



**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

January 31, 2006

The Honorable Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: BellSouth Telecommunications, Inc. v. NewSouth Communications Corp.  
Docket No.: 2004-63-C

Dear Mr. Terreni:

Enclosed for filing are an original and 10 copies of BellSouth Telecommunications, Inc.'s First Request for Production of Documents to NewSouth Communications Corporation.

By copy of this letter, I am serving this document on all parties of record.

Sincerely,

Patrick W. Turner

PWT/nml  
Enclosure  
cc: All Parties of Record  
619820

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**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2004-63-C**

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In Re:	)	<b>BellSouth Telecommunications,</b>
BellSouth Telecommunications	)	<b>Inc.'s First Request For</b>
Complaint and Request for Summary	)	<b>Production of Documents to</b>
Disposition Against NewSouth	)	<b>NewSouth Communications</b>
Communications Corp.	)	<b>Corporation</b>
_____	)	

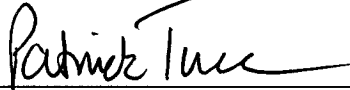
**TO: Jack Pringle, Esquire, Counsel for NewSouth Communications Corporation:**

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its First Request for Production of Documents to NewSouth Communications Corporation ("NewSouth").

**REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Please produce copies of NewSouth's responses to the Office of Regulatory Staff's First Continuing Data Request in this docket (dated January 20, 2006), together with any and all attachments thereto.

BELLSOUTH TELECOMMUNICATIONS, INC.



\_\_\_\_\_  
Patrick W. Turner  
1600 Williams Street, Suite 5200  
Columbia, South Carolina 29201  
(803) 401-2900

ATTORNEY FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA

)

)

COUNTY OF RICHLAND

)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s First Request for Production of Documents to NewSouth Communications Corporation in Docket No. 2004-63-C to be served on the following this January 31, 2006:

Wendy Cartledge, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211  
**(U. S. Mail and Electronic Mail)**

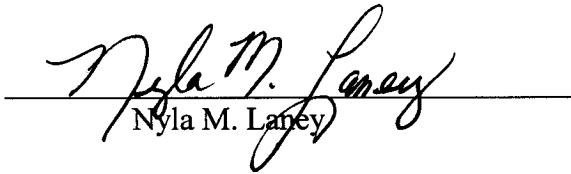
F. David Butler, Esquire  
General Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Joseph Melchers  
Chief Counsel  
S.C. Public Service Commission  
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Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
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(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, South Carolina 29201  
(NewSouth Communications, Corp.)  
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Nyla M. Laney

PC Docs # 529919